

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

June 24, 2025

Nathan Ochsner, Clerk of Court

United States of America

v.

Christopher Painter

Case No.

4:25-mj-384

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 11- June 7, 2025 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. 2251(a)

Offense Description

Sexual Exploitation of Children

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Brianna Reese

Complainant's signature

Brianna Reese, FBI Special Agent

Printed name and title

Sworn to before me telephonically.

Date: June 24, 2025

City and state: Houston, Texas

Peter Bray

Judge's signature

Peter Bray, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN THE MATTER OF:
Christopher Painter

§
§

Case No. **4:25-mj-384**

AFFIDAVIT IN SUPPORT OF APPLICATION

I, Brianna Reese, being duly sworn, deposes and states:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I have been a Special Agent of the FBI since October 2022. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest, and performing other duties imposed by law. I am currently assigned to the FBI Houston Human Trafficking Task Force (HTTF) and investigate a variety of human trafficking matters to include Violent Crimes Against Children (VCAC). Prior to this assignment, I was a Special Agent of the United States Secret Service since 2019. I have been trained in the preparation, presentation, and service of criminal arrest and search warrants and have been involved in the investigation of offenses against the United States to include violent crimes against children and human trafficking offenses.
2. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal child pornography laws in which computers are used as the means for receiving, transmitting, and storing child pornography as defined in Title 18, United States Code, Section 2256.
3. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal child pornography laws in which computers are used as the means for receiving, transmitting, and storing child pornography as defined in Title 18, United States Code, Section 2256.
4. This Affidavit is made in support of a criminal complaint charging Christopher Painter with violating Title 18, United States Code, Section 2251(a)- the sexual exploitation of children. I am familiar with the information contained in this Affidavit based upon the investigation I have personally conducted and my conversations with other law enforcement officers involved in this investigation, or who have engaged in numerous

investigations involving child pornography.

5. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of a violation of Title 18, United States Code, Section 2251(a)– the sexual exploitation of children, has been committed by Christopher Painter on or around March 11, 2025 through on or about June 7, 2025. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.
6. On June 23, 2025, Harris County Sheriff's Office (HCSO) Detective Elvia Villarreal contacted FBI Special Agent Brianna Reese regarding a 16-year-old MINOR VICTIM¹ (*hereafter, referred to as "MV"*) who has been identified in various Cyber Tip Reports with the National Center for Missing and Exploited Children (NCMEC).
7. Bark Technologies is an application that was created to keep children safe online. It is an application that runs in the background on a device. The application is used to scan a child's phone activities. Bark Technologies monitors texts, social media, apps & more for potential dangers. Bark Technologies also monitors location activities on the child's device.
8. Bark Technologies generated approximately 11 Cyber Tip reports with NCMEC pertaining to MV. The Cyber Tip Reports were generated on or about March 27, 2025 – May 26, 2025. Bark Technologies was alerted of explicit messages being exchanged to/from the MV's cell phone. Within the reports, Bark has the approximate age listed for MV as 16 years old along with her telephone number. Contact information listed on MV's Bark account is Account Email: painterwacker@gmail.com; Notification Email: painterwacker@gmail.com; Notification Phone: 432-270-0849; Registered Places: (Home)- 2402 Amber Springs Drive, Katy, TX 77450.
9. Detective Villarreal conducted law enforcement database searches for telephone number 432-270-0849 and found the number to be associated with Christopher Painter, Date of Birth: 11/17/1981, address: 19515 Billineys Park Drive in Katy, Harris County, Texas.
10. Detective Villarreal also found a call for service made on August 20, 2023 in reference to a "Runaway" where Christopher Painter is the reporting party and used phone number 432-

¹ The minor victim's identity is known to law enforcement but is not being disclosed at this time for confidentiality purposes.

270-0849 to contact law enforcement. I also located a call for service made on September 15, 2023 and documented under Case# 2309-05651 where MV reported being harassed/sextorted by an unknown male.

11. Your affiant has reviewed CyberTipline Report 208298455, received by NCMEC on 03-28-2025 11:23:35 UTC. Below are excerpts of the messages between MV and telephone number 432-270-0849 outlined in the report.

March 16, 2025 at 12:32 AM:

- MV: ...we might have to do the 7 minute one because I can't do the fucking machine
- x0849: Fuck ok give me like 10 mins if she can wait then I'm just shoving it in and going holy fuck
- MV: We only have to do missionary and doggie now
- MV: I'm just gonna stick on in so it goes in easier and just overall faster

March 16, 2025 at 12:55 AM:

- "Annie"²: 7 mins non stop slow, then fast, then hard (if you think your going to come and it's 7 mins don't stop you need to release) just saying or your going to be walking funny for 5 days
- MV: Okay
- "Annie": I'm going to start recording I've gotta go up stairs and turn in all my paperwork so you do you just watch porn

12. Your affiant has reviewed CyberTipline Report 208270090, received by NCMEC on 03-27-2025 18:54:13 UTC. Below are excerpts of the outlined in the report.

March 27, 2025 at 3:33 AM:

- MV: Vag Hole: 1500mm Labia: 9000mm Clit: 500mm
- "Annie": Got it
- "Annie": Sensors coming online!
- MV: Also, is there any way we could possibly get the 3rd and 4th jobs done this Saturday Sunday lol?
- "Annie": Remember lube everything first 5 mins is in and out deep without any movement or vibration

² "Annie" is an UNKNOWN SUBJECT at this time. Based on the content of the messages provided in the Cybertip Report, it appears that "Annie" is directing MV to perform sexual acts while remotely being recorded. It appears as though "Annie" is able to watch MV in real time perform the sexual acts.

- MV: alright
 - MV: And for breast sensors do you need center of chest or under each breast?
 - “Annie”: are you going to be watching any porn?
 - MV: if I were to it would have to be quiet
 - MV: okay are you ready and are sensors good?
 - “Annie”: Is it completely on?
 - MV: Still trying,, got tense and had to pause
 - “Annie”: Ok like that for 30 mins don’t turn off or pull out
 - “Annie”: By all means moan if you have to
 - “Annie”: Stimulate your nipples try to orgasm
 - MV: I think it just died on me
 - MV: Maybe not
13. CyberTipline Report 208252931, received by NCMEC on 03-27-2025 11:52:30. Below are excerpts of the messages from the report.

March 27, 2025 at 4:58 AM:

- x0849: Ok so we used 3 condoms I haven’t bought anymore so sex is out so it’s up to you cause I know you hate that pos machine³
- MV: ...that was the easiest on now I don’t know what the fuck to do
- MV: Can you message Annie?
- MV: Also, I’m gonna need most of the toys accessible to me, so I need you to get that case
- x0849: I mean I can raw dog it and pull out if it gets to that point?
- x0849: So we have jobs in Ft worth?
- MV: no, ..., what’s the nearest place you get condoms?
- MV: Because I really need you to
- x0849: Everybody’s closed it’s midnight
- x0849: We can do the fingering handjob thing that’s easier
- x0849: and covered lights off
- MV: I’m not touching no
- MV: ykw⁴ 5 minutes is a short amount of time so lets js do the 5 minute sex and get this over with

³ Based on the review of other messages, it appears that x0849 is referring to a sex machine that MV was using while performing different sex acts.

⁴ Based on training and experience, your affiant knows that “ykw” is slang for “you know what”.

- x0849: raw dog?
14. Your affiant has reviewed CyberTipline Report 209699293, received by NCMEC on 04-21-2025 09:36:25. Below are excerpts of the messages from the report. MV is communicating with an UNKNOWN SUBJECT, “Tammy”. Tammy’s phone number is believed to be 561-944-0772 based on review of all messages provided in the NCMEC reports.

April 21, 2025 at 5:36 AM:

- MV: I'm sorry I forgot to, do you need us to retry the sex part?
- “Tammy”: Lets go back to missionary with you using vibrator for clit stimulation condom is up to yall
- MV: Okay, and missionary until one of us finishes correct?
- “Tammy”: Yes
- MV: and I'm letting you know that this will use the last condom
- “Tammy”: I have 10 more headed your way already
- “Tammy”: For practice and Friday night

April 21, 2025 at 5:38 AM: [Messages between MV and x0849]

- X0849: Omw⁵
 - X0849: Hurry and lay down
15. On June 23, 2025, FBI Houston contacted the law enforcement point of contact for Bark Technologies and spoke with the CEO, Brian Bason. Mr. Bason voluntarily provided the following information to the FBI based on the exigent circumstances.
16. The shipping address for the MV’s account is listed as Christopher Painter, 2402 Amber Springs Drive, Katy, TX 77450. IP Address at time of signup: 73.206.35.197; Signed Up: September 5, 2023.
17. Mr. Bason also provided messages between x0849 and x0772 [believed to belong to “Tammy”].

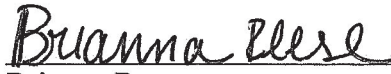
⁵ Based on training and experience, your affiant knows that “omw” is slang for “on my way”.

UNKNOWN DATE:

- X0849: Ok so she is not going to do the sex shit and the partner stuff is taking a lot on her mentally
 - X0772: She has the 4 partner jobs left and 5 solos. She has to practice and masturbate daily. If she doesn't want to practice having sex in different positions it will be painful when she goes to the dr and when her jobs come up. Its practice at her convenience nothing timed or instructions.
 - X0849: And if she is underage why are yall still making her do jobs??
 - X0772: She having to continue because she doesn't have a valid ID and if we stop her we have to turn stuff in to the FCC and if they found out we, you, and her would be in serious trouble. That's why we only said one time a week. But she needs to practice not stopping during things. Honestly, her best sex was the one when she was asleep. Maybe she can get her partner to practice when she's asleep?
18. On or about June 23, 2025, your Affiant conducted a law enforcement database check for Christopher Painter, DOB: 11/17/1981 and observed an updated address of 2402 Amber Springs Drive, Katy, Texas 77450.
 19. On June 23, 2025, your Affiant obtained a federal search warrant and FBI Special Agents, Harris County Sheriff's Department, and Task Force Officers executed it at 2402 Amber Springs Drive, Katy, Texas 77450. During execution of the search warrant, agents were able to conduct a post- Miranda interview with PAINTER. During the interview, PAINTER provided the following information.
 20. PAINTER's telephone number is 432-270-0849. PAINTER has had this same telephone number since approximately 2013.
 21. PAINTER's email is painterwacker@gmail.com. PAINTER lives at 2402 Amber Springs Drive, Katy, Texas 77450. PAINTER used to live at 19515 Billineys Park Drive in Katy, Harris County, Texas.
 22. PAINTER advised he is from the Abilene, TX area and moved to Houston, TX in October 2021 to be closer to his wife's family.

23. PAINTER's cellphone is an Android and has had it for approximately one month and a half. PAINTER advised his old phone was lost and does not know where it is. PAINTER advised his current phone is a Galaxy ULTRA and is not password protected.
24. In 2023, when they were living at their old address located at 19515 Billineys Park Drive in Katy, Harris County, Texas, PAINTER called the HCSO regarding MV's wellbeing because an unknown individual was sexually harassing MV.
25. PAINTER has installed Bark on MV's phone to monitor MV's activities after the 2023 incident.
26. In January of 2025, MV downloaded Discord. "They" started harassing MV on Discord and began gathering personal information associated with the entire family to include PAINTER'S parents' phone numbers and bank account information.
27. MV was panicked and PAINTER did not want to call the police because that would make MV "not sleep for days on end".
28. It got bad and MV would toss and turn at night. MV asked if PAINTER could help her do something. It looked like little nicotine patches that PAINTER put on MV. PAINTER clarified that the patches were sensors. PAINTER put them above MV's breasts, stomach, and thighs.
29. PAINTER started talking with "them" and they would switch numbers every two to three weeks. PAINTER would communicate with "them" via regular text message. "They" would instruct PAINTER to do certain things; otherwise, there would be consequences. One time, "they" removed money from his bank account.
30. "They" then told MV that MV had to have sex with PAINTER. "They" sent condoms to the house in yellow packaging. "They" told MV to "fuck something" and PAINTER told MV to "get a cucumber and she was worried about putting it inside, so she just rubbed it".
31. PAINTER had sexual intercourse with MV but PAINTER "did his best not to put it in". The cameras were connected to the Internet for "them" to see. PAINTER installed a hard-wired hidden camera in MV's bedroom that looks like a smoke detector.
32. The last time PAINTER had sexual intercourse with MV was the first week of June. They have sexual intercourse in MV's bedroom. The camera in MV's bedroom records 24/7 so it would have recorded them having sexual intercourse.

33. PAINTER and MV have had sexual intercourse approximately five times, the last time being the first week of June 2025. They would have sex at night around 11:00 PM, 12:00 AM or 1 AM.
34. During the residential search warrant, law enforcement found the hard-wired hidden camera in MV's bedroom. There was an additional mount for the hidden camera located in MV's bathroom connected to her bedroom. The camera system was wired through the attic with three total ports leading to MV's bedroom, bathroom, and closet. Law enforcement found multiple sex toys / pillows, new and used condoms, personal lubrication, and a "sex machine" in MV's bedroom.
35. During a preliminary review of PAINTER's cellphone, the following information was found.
36. In a text message thread between PAINTER and a contact saved as "Chris H", (telephone number 832-419-6504), a photograph was sent to "Chris H" on March 11, 2025 at 12:56 PM. The photograph appears to be a screenshot from a video recorded from the hidden camera located in MV's bedroom. The image depicts PAINTER having sexual intercourse with MV in MV's bedroom.
37. Based upon the information delineated above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Christopher Painter with a violation of Title 18, United States Code, Section 2251(a).


Brianna Reese
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to telephonically on this 24th day of June 2025, and I find probable cause.


The Honorable Peter Bray
UNITED STATES MAGISTRATE JUDGE